

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

X	:	
CARDLE CHASE JOHN,	:	22-cv-09758 (AT)
	:	
Plaintiff,	:	STIPULATION OF
	:	<u>CONFIDENTIALITY</u>
- against -	:	
	:	
ADAPT COMMUNITY NETWORK, GARY	:	
DREYFUSS, and ISABELLA DOMBROWSKI,	:	
	:	
Defendants.	:	
	:	

IT IS HEREBY STIPULATED AND AGREED that documents and information produced by Defendants, or to be produced by Defendants, in response to Plaintiff Cardle Chase John's Interrogatories and/or Request for the Production of Documents, which contain personal, confidential and/or proprietary information, and documents produced by Plaintiff in response to Defendants' Request for Production of Documents which contain personal, confidential financial or medical information, and are not public or publicly available documents, are and shall remain confidential information, and have been disclosed by the parties to be utilized solely in connection with the above-captioned action by:

- (1) the Court, Court personnel, court reporters and depositions and, if applicable, the Jury;
- (2) the Plaintiff and his attorney of record, other attorneys acting "of counsel" for the Plaintiff in this action provided said attorneys are shown a copy of this Stipulation and agree to be bound by same, and persons employed in said attorneys' offices;

- (3) Defendants, Defendants' attorneys of record, other attorneys acting "of counsel" for Defendant in this action provided said attorneys are shown a copy of this Stipulation and agree to be bound by same, and persons employed in said attorneys' offices;
- (4) persons retained in this action to assist in the prosecution or defense of this action, including technical and professional experts and persons employed and affiliated with such experts provided that said individuals are shown a copy this Stipulation, and agree to be bound by same; and
- (5) witnesses during the course of depositions, trial testimony or pre-deposition or pre-trial preparation.

The parties further agree that documents marked confidential shall not be disclosed to any other party and/or his or her attorney of record in this Action ("Other Party"), unless that Other Party has executed an appropriate Confidentiality Stipulation.

In the event that either party disagrees with any designation of confidential information, counsel for each party shall notify opposing counsel of their objection in writing. The parties shall confer and attempt to resolve the matter informally. If they are unable to do so, an application may be made to the Court for a determination whether particular documents or other information should be treated as confidential information or whether the disclosure of the information shall be permitted. The information in question shall be treated as confidential information, subject to the terms of this Confidentiality Agreement, until the dispute is resolved (either by agreement of counsel for the parties or by an Order of the Court).

Dated: June 29, 2023
New York, New York

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New York, New York

STIPULATED AND AGREED TO:

/s/ Siobhan Klassen
Siobhan Klassen
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Attorneys for the Plaintiff

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Attorneys for Defendants

SO ORDERED:


ANALISA TORRES
United States District Judge

Dated: June 30, 2023
New York, New York